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August 31, 2023

*In re Google Digital Advertising Antitrust Litigation, No. 1:21-md-03010 (PKC);
Singh v. Google LLC, No. 1: 23-cv-03651 (PKC)*

Dear Judge Castel,

We represent Meta Platforms, Inc. (“Meta”) in the above-captioned multidistrict litigation (“MDL”). We write in regards to the *Singh v. Google LLC* action, centralized into the MDL for pre-trial proceedings pursuant to Conditional Transfer Order No. 10 (Dkt. No. 534). In accordance with Rule 1.A of the Court’s Individual Practices, we note there is no conference currently scheduled before the Court.

Mr. Sunny Singh filed an action on behalf of advertisers against Google LLC (“Google”), Alphabet Inc. (“Alphabet”) and Meta in the Central District of California (23-cv-02539) on April 4, 2023—*after* the motion to dismiss briefing on the Advertisers’ Consolidated Amended Complaint (the “Advertisers’ CAC”, Dkt. No. 399) was completed on March 31, 2023 in the MDL. In light of the significant overlaps between the complaints, Defendants Google, Alphabet, Meta and Plaintiff reached a stipulation that any ruling by the Court on the pending motions to dismiss the Advertisers’ CAC, except a ruling regarding issues of individual named plaintiffs’ obligations to arbitrate claims against Defendants Google and Alphabet, would be deemed to apply to the *Singh* complaint. That stipulation and proposed order was filed with the Court on July 21, 2023. (Dkt. No. 588-1.) The Court has not entered that proposed order.

On August 3, the Court entered an order permitting the Google defendants to file a motion to dismiss the *Singh* complaint by incorporating by reference the arguments set forth in their motion to dismiss the Advertisers Consolidated Amended Complaint. (Dkt. 596.) That motion is due September 8. (*Id.*)

To the extent the Court would prefer that Meta similarly file a motion to dismiss the *Singh* complaint by incorporating by reference the arguments that Meta set forth in its motion to dismiss the Advertisers Consolidated Amended Complaint (Dkt. 460-461, 519), Meta respectfully requests leave to file such motion on September 8.

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Respectfully,

/s/ Kevin J. Orsini

Kevin J. Orsini

The Honorable P. Kevin Castel
United States District Judge
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500 Pearl Street
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cc: All Counsel of Record (via CM/ECF)